



ATES ENVIRONMENTAL PROTECTION AGENCY

August 7, 2017

Mr. Anthony R. Brown  
Environmental Manager  
Atlantic Richfield  
Company  
4 Centerpointe Drive, LPR 4-435add  
La Palma, CA 90623-1066

**Subject: EPA Review of Atlantic Richfield's Response to EPA comments on the Focused Feasibility Study Revegetation Treatability Study Work Plan, Leviathan Mine Site, Alpine County, California; dated September 9, 2016; and Supplemental 2017 Soil Sampling for Soil pH in Revegetation Plots Leviathan Mine Site, Alpine County, California; dated July 19, 2017**

Dear Mr. Brown:

The U.S. Environmental Protections Agency (EPA) has reviewed ARC's September 9, 2016 response to EPA comments on the Focused Feasibility Study Revegetation Treatability Study (RTS) Work Plan and the Supplemental 2017 Soil Sampling for Soil pH in Revegetation Plots, dated July 19, 2017.

This work was submitted to EPA pursuant to Administrative Order for Remedial Investigation and Feasibility Study, Leviathan Mine, Alpine County, California (CERCLA Docket No. 2008-18, June 23, 2008).

**Background:** Atlantic Richfield provided EPA with a workplan dated March 31, 2016. On July 7, 2016; EPA conditionally approved the work plan and requested monthly monitoring reports. EPA included comments from the USDA Forest Service dated June 16, 2017 and comments from the Regional Water Quality Control Board dated May 16, 2016.

ARC provided a response to comments on September 9, 2016; and one short email on October 3, 2016 stating: *Atlantic Richfield received and analyzed the revegetation baseline characterization data and completed sampling for the Hydrology Plots. Based on the baseline characterization results, amendments have been ordered, and plot construction is anticipated for early October.* No further details or supporting data.

On July 17, 2017, ARC provided a field sampling plan describing supplemental soil sampling activities for the 2017 field season.

EPA has completed its review of these two submittals and finds the following:

- **Workplan:** EPA has considered ARC's response to comments and finds that the September 9, 2016 submittal adequately addressed EPA's July 7, 2017 comments at this time; with the following observations:
  - **Monitoring Reports and Corrective Measures:** EPA did not receive the requested monthly monitoring reports with ARC's summary of recommended corrective measures.
  - **Revegetation Treatability Study Report:** EPA looks forward to receipt of the monitoring data, details, and information on corrective measures taken, in the Treatability Study Report.
  - **Feasibility Study:** The majority of EPA and stakeholder comments were addressed. For those comments that we not addressed or are deferred, per ARC's response to comments, EPA looks forward to receipt of monitoring data, details, and evaluation addressed in the Treatability Study Report and the Feasibility Study (FS).
- **2017 Supplemental Sampling** EPA has completed its review of the July 17, 2017 submittal recommending supplemental sampling. ARC notes that additional information will assist in evaluating and refining performance monitoring over the course of the study. EPA has completed its review and has no additional comments on the proposed sampling.

Please proceed with the work as outlined, and present and evaluate all revegetation data in a Focused Feasibility Study Revegetation Treatability Study Report by December 1, 2018.

As noted, revegetation efforts often proceed for years, and additional information assists in effective study results. Please ensure that the ARC Revegetation Treatability Study Report includes historical data and Dr. Claassen's scientific input and comments based on his years of revegetation studies at Leviathan Mine under contract to the Lahontan Regional Water Quality Control Board.

If you have any questions, please feel free to contact me at (415) 947-4183 or [Deschambault.lynda@epa.gov](mailto:Deschambault.lynda@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Lynda Deschambault". The ink is dark and the signature is fluid, with the first name "Lynda" being more prominent than the last name.

Lynda Deschambault  
Remedial Project Manager

Cc by electronic Email:

Scott Ferguson, California Regional Water Quality Control Board, Lahontan Region

Douglas Carey, California Regional Water Quality Control Board, Lahontan Region

Norman Harry, Washoe Tribe of Nevada and California

David Friedman, Nevada Department of Environmental Protection

Kenneth Maas, United States Forest Service

Tom Maurer, United States Fish and Wildlife Service

Toby McBride, United States Fish and Wildlife Service

Steve Hampton, California Department of Fish and Wildlife

Marc Lombardi, AMEC